

SAS-JMR/2004R00398

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA)

CRIMINAL NO. 05-

888 (FLW)

v.)

MATTHEW D. THOMPkins,)

18 U.S.C. §§ 2423(a) and (e)

a/k/a "Seymore Benjamin,")

a/k/a "Craig Williams,")

a/k/a "Brandon Williams")

a/k/a "Knowledge,")

DEMETRIUS LEMUS,)

a/k/a "Tracy Vegas,")

a/k/a "Booby,")

NOEL LOPEZ,)

a/k/a "Finessc,")

MELISSA RAMLAKHAN,)

a/k/a "India,")

EMILY COLLINS-KOSLOSKY,)

a/k/a "Amber Higgins,")

a/k/a "Madonna,")

JACQUELINE COLLINS-KOSLOSKY,)

a/k/a "Kelly Blanche,")

a/k/a "Fortunc,")

ANNA ARGYROUDIS,)

a/k/a "Goddess,")

KEMYRA JEMERSON,)

a/k/a "Shereka Minor,")

a/k/a "Karen Wakefield,")

a/k/a "Slim Shady")

INDICTMENT

(Conspiracy to Transport Minors to Engage in Prostitution)

The Grand Jury in and for the District of New Jersey, sitting at Camden charges:

1. From in or about January 1999 to in or about December 2005, in the District of New Jersey, and elsewhere, defendants

MATTHEW D. THOMPkins,

a/k/a "Seymore Benjamin," a/k/a "Craig Williams," a/k/a "Brandon Williams," a/k/a
"Knowledge,"

DEMETRIUS LEMUS,

a/k/a "Tracy Vegas," a/k/a "Booby,"
NOEL LOPEZ,
a/k/a "Finesse,"
MELISSA RAMLAKHAN,
a/k/a "India,"
EMILY COLLINS-KOSLOSKY,
a/k/a "Amber Higgins," a/k/a "Madonna,"
JACQUELINE COLLINS-KOSLOSKY,
a/k/a "Kelly Blanche," a/k/a "Fortune,"
ANNA ARGYROUDIS,
a/k/a "Goddess,"
and
KEMYRA JEMERSON,
a/k/a "Shereka Minor," a/k/a "Karen Wakefield," a/k/a "Slim Shady,"

did knowingly conspire and agree with each other and with others to transport individuals who had not attained the age of 18 years in interstate commerce with the intent that the individuals engage in prostitution, contrary to Title 18, United States Code, Section 2423(a).

Object of the Conspiracy

2. It was the object of the conspiracy to recruit and transport minor girls and others between various cities, including Atlantic City, New Jersey, Bronx, New York and Las Vegas, Nevada, to engage in prostitution for the financial benefit of the defendants and their co-conspirators.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that the defendants and their co-conspirators managed a large-scale prostitution ring that operated in several states including, but not limited to, New Jersey, New York, Nevada, Pennsylvania, Florida, Massachusetts and the District of Columbia.

4. It was further part of the conspiracy that the defendants and their co-conspirators

recruited and transported minor girls between several states for the purpose of engaging in prostitution.

5. As a result of their actions in furtherance of the conspiracy, the defendants and their co-conspirators derived substantial income from the prostitution of minor girls and others.

Overt Acts

In furtherance of the conspiracy, and to effect its unlawful object, the defendants and their co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

6. In or about December 2003, defendant **MATTHEW D. THOMPCKINS** caused a minor girl, referred to herein as Minor Girl 1, to travel from Atlantic County, New Jersey to Las Vegas, Nevada to work as a prostitute.

7. On or about July 1, 2005, defendant **KEMYRA JEMERSON** caused a minor girl, hereinafter referred to as Minor Girl 2, to travel from Las Vegas, Nevada to New York to work as a prostitute for defendant **MATTHEW D. THOMPCKINS**.

8. On or about July 2, 2005, Minor Girl 2 met with defendant **MATTHEW D. THOMPCKINS** in New York, where he bought her clothes to wear while working as a prostitute.

9. On or about July 5, 2005, Minor Girl 2 traveled from New York to New Jersey to work as a prostitute for defendant **MATTHEW D. THOMPCKINS**.

In violation of Title 18, United States Code, Section 2423(e).

A TRUE BILL


CHRISTOPHER J. CHRISTIE
United States Attorney